

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION

HOTHMAN MISANE, TYLER  
SLEEP, and JEROL WILLIAMS,

Plaintiff,

Case No. 1:21-cv-487

v.

HON. HALA Y. JARBOU

CITY OF BANGOR, TOMMY  
SIMPSON, MAYOR DARREN  
WILLIAMS, and SCOTT GRAHAM,

Defendants.

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**DEFENDANT'S MOTION IN LIMINE TO LIMIT EVIDENCE AND TESTIMONY RELATING  
TO PREVIOUS HARASSMENT COMPLAINTS**

Now comes Defendant Tommy Simpson, by and through his attorneys, Plunkett Cooney, and moves this Court to exclude evidence and testimony relating to a previous complaint of sexual harassment by a City of Bangor employee, Amanda Karr. In support of this Motion, Defendant Simpson relies on the authorities and arguments in the attached Brief in Support.

As Local Rule 7.1(d) requires, Defendant sought concurrence from Plaintiff's counsel concerning this Motion on March 8, 2023, and concurrence was not granted.

Wherefore, Defendant Simpson requests this Court to exclude evidence and testimony relating to a previous complaint of sexual harassment by a City of Bangor employee, Amanda Karr.

Respectfully submitted,

DATED: March 9, 2023

By: /s/Charles L. Bogren  
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